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Attorneys for Federal Defendants

UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

WILD HORSE EDUCATION, and
LAURA LEIGH, individually,

Plaintiffs,

v.

U.S. DEPARTMENT OF INTERIOR,
BUREAU OF LAND MANAGEMENT, and
JOHN RABY, in his official capacity as
Nevada State Director of the Bureau of Land
Management,

Federal Defendants.

Case No. 3:23-cv-00372-MMD-CLB

**DECLARATION OF JOSEPH W.
CRUSHAM AND INDEX OF
EXHIBITS**

I, Joseph W. Crusham, declare and state as follows:

1. I am a trial attorney in the Wildlife and Marine Resources Section of the Environment and Natural Resources Division of the United States Department of Justice.
2. I am counsel for Federal Defendants in the above-captioned case.
3. I am licensed to practice law in the State of California and, as counsel for the Federal

Government, I am permitted to practice in the U.S. District Court for the District of Nevada.

4. I have personal knowledge of the matters contained in this declaration and, if called and sworn as a witness, I can and will competently testify to all of the matters stated herein.
5. I am attaching to this Declaration true and correct copies of the following exhibits, obtained from the Bureau of Land Management, which are cited in Federal Defendants' opposition brief and supporting declarations:

Exhibit	Description
1	Map of the Triple B Complex
2	2017 Antelope and Triple B Complexes Gather Plan Decision Record
3	BLM Nevada Wild Horse and Burro Population Statistics
4	Elko and White Pine County Declarations of Emergency
5	BLM Website Pages for November 1, 2024 Gather
6	Henneke Body Condition Scoring Chart
7	2023 Flight Inventory Memo for Triple B Complex
8	Government Accountability Office report on BLM Wild Horse and Burrow Program (2008) (Excerpted)
9	John Derek Scasta, <i>Mortality and Operational Attributes Relative to Feral Horse and Burro Capture Techniques Based on Publicly Available Data from 2010–2019</i> , 86 Journal of Equine Veterinary Science 102,893 (2020)
10	BLM Permanent Instruction Memorandum 2021-007: Euthanasia of Wild Horses and Burros Related to Acts of Mercy, health or Safety
11	Comprehensive Animal Welfare Program Team Assessment Report for 2022 Triple B Complex Gather

6. Exhibit 8 is a large document, so only a relevant excerpt is attached. The complete document can be made available to the Court upon request.

1 I declare under penalty of perjury that the foregoing is true and correct to the best of my
2 knowledge.

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4 Executed this 24th day of October, 2024

5 /s/ Joseph W. Crusham
6 Joseph W. Crusham
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